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*Attorneys for Defendants Binance Capital Management Co., Ltd.,  
Changpeng Zhao, Yi He, and Ted Lin*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

Ryan Cox, individually and on behalf of all  
others similarly situated,

Plaintiff,

v.

CoinMarketCap OpCo, LLC; Binance  
Capital Management Co., Ltd. d/b/a Binance  
and Binance.com; BAM Trading Services  
Inc. d/b/a Binance.US; Changpeng Zhao;  
Catherine Coley; Yi He; Ted Lin; and Does  
I-X;

Defendants.

Case No. 21-cv-08197-PCT-SMB

**CERTIFICATION OF COUNSEL  
PURSUANT TO LOCAL RULE  
12.1(c)**

**CERTIFICATION OF COUNSEL**

Pursuant to Local Civil Rule 12.1(c), the undersigned hereby certifies that, on May 18, 2022, counsel for Defendants Binance Capital Management, Changpeng Zhao, Yi He, and Ted Lin (collectively, “Defendants”) and Plaintiff’s counsel conferred by telephone to discuss the issues asserted in Defendants’ Motion to Dismiss. The parties were unable to agree that the deficiencies identified in the Complaint were curable by a permissible amendment.

DATED: May 23, 2022

By: /s/ Jake E. Struebing  
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